

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

IN RE: BDC GROUP, INC., Debtor.	Case No. 23-00484 RESISTANCE AND OBJECTION AGAINST MOTION TO STAY CASE DEADLINES
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COMES NOW Keystone Savings Bank (“Bank”), and hereby objects to and resists the Debtor’s Motion for Stay (Dkt #372), as follows:

1. As alleged in recent filings by the Bank, there appears to be no liability or equipment insurance coverage. And indeed the Debtor professed it will not be operating.
2. Given the apparent lack of insurance and the non-operating status of the business, and further bearing in mind the weather conditions, the Debtor is effectively asking for all the equipment items and computers, etc. to sit idle. The risks of harm (such as theft, fire, exposure, etc.) are apparent and real.
3. Any stay is therefore harmful to the Bank and the collateral pledged to it by the Debtor.
4. Further, the Debtor is converting to Chapter 7, and as such the Debtor will not be a Debtor-in-Possession. Any stay must be conditioned on the posting of a bond. The Motion did not even mention or offer any bond, and is therefore facially deficient.

WHEREFORE, the Bank respectfully prays the Debtor’s Motion be denied, and for such other relief as may be just and proper under the premises.

/s/ Eric W. Lam

Eric W. Lam, AT0004416

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 29, 2024, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF System.

/s/ Kelly Carmichael

Keystone BDC/Pldgs/Drafts/Obj to Mtn to Stay.012924.149p.ewl